

REMARKS

Applicants have carefully studied the outstanding Office Action. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

In Paragraphs 3 - 25 of the Office Action, claims 1 - 86 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Guedalia, U.S. Patent No. 6,121,970 ("Guedalia") in view of Aldred et al., U.S. Patent No. 6,209,036 ("Aldred") in further view of Marmor, U.S. PG Pub. No. 2002/0026475).

In applicants' Preliminary Amendment filed on March 7, 2005, applicants amended the independent claims and argued on page 15, paragraph 2, that *"In order to further distinguish between the present invention, Guedalia and Aldred, applicant has amended independent claims 1, 23, 45 and 66 so as to clarify that references to digital image files are substituted with references to corresponding encrypted files. Neither Guedalia nor Aldred describes such substitution. Indeed, Guedalia describes substituting a reference to a first image portion with a reference to a second image portion, and Aldred describes substituting a directory-reference URL with a web page URL."*

Applicants believe that the Examiner may have overlooked this limitation in rejecting claims 1, 23, 45 and 66 in the present Office Action. In Paragraph 5 of the Office Action, the Examiner, citing Guedalia, reiterated from the previous Office Action of July 8, 2004 that *"As per claims 1, 23, Guedalia teaches ... generating a modified layout page from the original layout page by replacing at least one of the references to digital images in the original layout page with references."* However, as indicated above, Guedalia does not teach *"replacing at least one of the references to digital image files in the original layout page that are designated as being protected, with references to corresponding encrypted digital image files", as in claims 1 and 23. The Examiner seems to have overlooked the limitation of "corresponding encrypted digital image files" in his rejection of claims 1 and 23.*

In addition, on Page 3 of the Office Action the Examiner indicates that *"Guedalia fails to teach an inventive concept of substitute data file ... However, Aldred et al. teach an inventive concept of substitute data file ..."* However, in the Preliminary Amendment filed on March 7, 2005, applicants removed the language *"substitute data file"* and replaced it with -- *corresponding*

encrypted digital image files --. Again, the Examiner seems to have overlooked this limitation.

A similar discrepancy appears in Paragraph 17 of the Office Action regarding the rejection of claims 45 and 66.

It appears that the version of the claims used by the Examiner in the present Office Action is different than the version of the claims as amended in that Preliminary Amendment.

Also, in Paragraphs 5 and 17 the Examiner cites Marmor, Paragraph 98, as teaching the concept of digital images that are designated as being protected. However, applicants have carefully read this citation and there is no mention of protected digital images; instead, Marmor mentions "*protecting against improperly structured WWW pages*", which is a syntactical matter.

As such, applicants hereby incorporate all arguments provided in the Preliminary Amendment filed on March 7, 2005.

For the foregoing reasons, applicant respectfully submits that the applicable objections and rejections have been overcome and that the claims are in condition for allowance.

Date: July 5, 2005

Squire, Sanders & Dempsey LLP
600 Hansen Way
Palo Alto, CA 94304-1043
Tel: (650) 856-6500
Fax: (650) 843-8777

Respectfully submitted,

By M. A. Sockol

Marc A. Sockol
Attorney for Applicant(s)
Registration No.: 40,823

CERTIFICATE OF MAILING

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to Mail Stop MISSING PARTS Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on

Date: July 5, 2005

By: Cathi L.G. Thoorsell

Cathi L.G. Thoorsell

PaloAlto/86185.1